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9 IMPLICIT CONVERSIONS, INC.

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 IMPLICIT CONVERSIONS, INC, a
14 Delaware Corporation,

15 Plaintiff,

16 vs.

17 JACOB STINE, an individual, JUANITA
18 TRAVER STINE, an individual, and DOES
1-10, inclusive,

19 Defendants.

20
21 JACOB STINE, an individual; JUANITA
22 TRAVER STINE, an individual,

23 Counterclaimants,

24 vs.

25 IMPLICIT CONVERSIONS, INC, a
26 Delaware Corporation; and ROBIN
LAVALLEE, an individual,

27 Counterdefendants.
28

Case No. 3:24-cv-03744-WHO

**REPLY DECLARATION OF JOSEPH B.
PALMIERI IN SUPPORT OF MOTION
FOR SANCTIONS**

Hearing Date: September 17, 2025
Time: 2:00 p.m.
Judge: William H. Orrick
Courtroom: 2 - 17th Floor

Date Action Filed: June 21, 2024
Trial Date: January 5, 2026

JURY TRIAL DEMANDED

GRELLAS SHAH LLP
550 CALIFORNIA ST., SUITE 1040
SAN FRANCISCO, CA, 94104

1 I, Joseph B. Palmieri, hereby declare:

2 1. I am a member in good standing of the bar of the State of California and an
3 associate with the law firm of Grellas Shah LLP, counsel for Plaintiff and Counterdefendant
4 Implicit Conversions, Inc. (“Implicit”). I have personal knowledge of the matters stated herein
5 and if called as a witness, I could and would testify thereto.

6 2. On May 30, 2025, defendant Juanita Traver Stine sat for oral deposition.
7 Attached hereto as **Exhibit 1** is a true and correct copy of excerpts of the transcript from the
8 May 30, 2025 deposition of Juanita Stine.

9
10 I declare under penalty of perjury pursuant to the laws of the United States of America
11 that the foregoing is true and correct. Executed in San Francisco, California on September 2,
12 2025.

13
14 /s/ Joseph B. Palmieri

15 Joseph B. Palmieri, Esq.
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Exhibit 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

---oOo---

IMPLICIT CONVERSIONS, INC., a :
Delaware Corporation, :
 :
Plaintiff, :
 :
vs. : 3:24-cv-03744-WHO
 :
JACOB STINE, an :
individual, JUANITA TRAVER :
STINE, an individual, and DOES :
1-10, inclusive, :
 :
 :
Defendants. :
----- :

CONFIDENTIAL VIDEO-RECORDED
DEPOSITION OF JUANITA TRAVER STINE
May 30, 2025

Job No. 1330107
Stenographically reported by:
LAURA AXELSEN, CSR NO. 6173
RMR, CCRR, CRR, CRC, RDR

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4 ---oOo---
5 IMPLICIT CONVERSIONS, INC., a :
Delaware Corporation, :
6 :
Plaintiff, :
7 :
vs. : 3:24-cv-03744-WHO
8 :
JACOB STINE, an individual , :
9 JUANITA TRAVER STINE, an :
individual, and DOES 1-10, :
10 inclusive, :
: :
11 :
Defendants. :
12 ----- :
13 BE IT REMEMBERED THAT, pursuant to Notice and
14 on Friday, May 30, 2025 at 9:02 a.m. thereof at One
15 Sansome Street, Suite 3500, San Francisco,
16 California, before me, LAURA AXELSEN, a Certified
17 Shorthand Reporter, personally appeared
18 JUANITA TRAVER STINE,
19 called as a witness by the Plaintiff.
20 ---oOo---
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1 APPEARANCES

2

3 FOR THE PLAINTIFF:

4

5 GRELLAS SHAH LLP

6 BY: JOSEPH B. PALMIERI, ESQ.

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10

11 FOR THE DEFENDANTS:

12

13 STRUCTURE LAW GROUP, LLP

14 BY: JACKIE FORD, ESQ.

15 1754 Technology Drive, Suite 135

16 San Jose, California 95110

17 jford@structurelaw.com

18

19 There also being present Dhaivat Shah, Karen

20 Rothschild, and Marcus Major, videographer.

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1 VIDEOGRAPHER: Good morning. We are now
2 on the record. The time is 9:02 a.m. Today's date
3 is May 30th, 2025. This marks the beginning of
4 Media File No. 1 in the deposition of Juanita Traver
5 Stine in the matter of Implicit Conversions, Inc.,
6 versus Jacob Stine, et al., Case No.
7 3:24-CV-03744-WHO. We are located at One Sansome
8 Street, Suite 3500, San Francisco, California.

9 My name is Marcus Major, the videographer,
10 with Magna Legal Services. Will all counsel present
11 please introduce themselves, starting with the
12 noticing attorney.

13 MR. PALMIERI: Joseph Palmieri, with the
14 law firm Grellas Shah, for Implicit Conversions,
15 Inc. I'm joined by my colleague, Dhaivat Shah.

16 MS. FORD: Good morning. Jackie Ford on
17 behalf of Juanita Traver Stine and defendant Jacob
18 Stine. Also here from my law office is Karen
19 Rothschild. We're Structure Law Group, LLP.

20 VIDEOGRAPHER: Thank you. Will the court
21 reporter please introduce herself and swear in the
22 witness.

23 THE REPORTER: I am Laura Axelsen, CSR No.
24 6173.

25 JUANITA TRAVER STINE

1 having been duly sworn/affirmed

2 under penalty of perjury

3 testified as follows:

4 EXAMINATION BY MR. PALMIERI

5 MR. PALMIERI: Q. Good morning,

6 Ms. Traver Stine. I want to go over some ground

7 rules for today's deposition. Is that okay?

8 A. Yes.

9 Q. First, have you ever been deposed before?

10 A. No.

11 Q. Okay. Just so you know, this deposition

12 is being recorded by a court reporter. So please

13 answer orally. No head shaking or other gestures.

14 A. Okay.

15 Q. And when you speak, please do not speak

16 over anyone else because it makes it difficult for

17 the court reporter to get a clean transcript.

18 If you need to take a break, please let me

19 know, but you'll need to finish your answer to the

20 question before we can take a break.

21 During the course of the deposition, your

22 counsel may make objections. If she makes an

23 objection, you must still answer my question unless

24 she directs you not to answer.

25 Do you understand?

1 Robin a friend, why do you think he would try to
2 hurt you in any way?

3 A. I think that he was trying to harass
4 myself and Jake.

5 Q. Do you typically harass your friends?

6 A. I don't harass my friends.

7 Q. So what do you think Mr. Lavallee's
8 motivation would be to harass you?

9 A. I think that he believed that Jake did
10 something to remove Robin's access to Implicit in
11 some way, and that Robin was trying to get back at
12 us for that.

13 Q. So do you think Mr. Stine did remove
14 Robin's access to the Implicit computer system?

15 A. I don't know.

16 Q. So you said you don't know if Mr. --
17 Mr. Stine removed Mr. Lavallee's access to any
18 Implicit computer systems, correct?

19 A. That's correct.

20 Q. And, to your knowledge, Mr. Stine was
21 terminated on June 14th, 2024, correct?

22 A. Correct.

23 Q. Putting aside you not knowing whether or
24 not he removed -- Mr. Stine removed Lavallee's
25 access, do you have any knowledge about whether or

1 not Mr. Stine accessed the Implicit computer
2 networks after -- after his access was revoked post
3 termination?

4 A. I don't.

5 Q. And at that time, on June 14th, 2024,
6 you were currently employed by Implicit, correct?

7 A. Yes.

8 Q. You were the human resources generalist?

9 A. Yes.

10 Q. And you were aware that there were
11 accusations that Mr. Stine had unauthorized access
12 into the Implicit computer networks?

13 A. Objection; vague as to time.

14 Q. On June 14th from -- from June 14th,
15 2024 -- strike that.

16 At what point did you become aware that
17 there were accusations that Mr. Stine had
18 unauthorized access to the Implicit computer
19 networks?

20 A. I believe that there were accusations on
21 Slack from Robin.

22 Q. You saw those Slack messages?

23 A. I saw Slack messages.

24 Q. And do you know, roughly, when that was --
25 those Slack messages that you saw, what they were

1 dated?

2 A. There were Slack messages that were going
3 out on that same evening.

4 Q. So the evening of June 14th, 2024, you
5 were aware of these accusations?

6 A. I was aware that there were messages.

7 Q. And do you recall what those messages
8 said?

9 A. There were messages that were something to
10 the effect of wanting to address the elephant in the
11 room.

12 Q. What's your understanding of the elephant?

13 A. That something had occurred that Jake was
14 no longer on Slack.

15 Q. And on the evening of June 14th, 2024,
16 were you aware that Mr. Stine was terminated by
17 Implicit?

18 A. I believe there was an email that Robin
19 had sent out to everyone, but I don't remember what
20 date that was.

21 Q. Another exhibit. So to clarify, the
22 evening of June 14th, 2024, do you know, yes or
23 no, whether Mr. Stine was terminated by Implicit?

24 A. I believe so.

25 Q. You believe so or --

1 A. I don't recall.

2 Q. Okay. Do you recall in Jake's deposition
3 when he said that he entered the Implicit computer
4 networks using his -- using your password and that
5 subsequently disabled Mr. Lavallee's access?

6 A. Not really. I'm sorry.

7 Q. Okay. When were you terminated from
8 Implicit?

9 A. On June 24th.

10 Q. Okay. And do you have any idea of why you
11 were terminated?

12 A. Yes.

13 Q. And why is that?

14 A. Why do I believe I was terminated or why
15 was --

16 Q. What's your opinion of why you were
17 terminated?

18 A. Because I'm Jake's wife.

19 Q. What was communicated about why you were
20 terminated?

21 A. I don't remember exactly, actually.

22 Q. Has Mr. Stine ever asked for your password
23 before?

24 A. Yes.

25 Q. Do you have any idea what he's used your

1 CERTIFICATE

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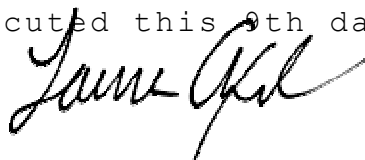
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I, the undersigned, a Certified Shorthand Reporter, State of California, hereby certify that the witness in the foregoing deposition was by me first duly sworn to testify to the truth, the whole truth, and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place therein stated; that the testimony of the said witness was reported by me, a disinterested person, and was thereafter transcribed under my direction into typewriting; that the foregoing is a full, complete, and true record of said testimony; and that the witness did not request an opportunity to read it and, if necessary, correct said deposition and to subscribe the same.

I further certify that I am not of counsel or attorney for either or any of the parties in the foregoing deposition and caption named, nor in any way interested in the outcome of the case named in said caption.

Executed this 9th day of June, 2025.



LAURA AXELSEN, C.S.R. 6173.